

**DEPOSITION OF STOYAN TERZIEV**  
**IN THE MATTER OF THE COMPLAINT OF ETERNITY SHIPPING, LTD.**  
**May 27, 2003**

**CONDENSED TRANSCRIPT AND KEYWORD INDEX**

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1 IN THE UNITED STATES DISTRICT COURT  
 2 FOR THE DISTRICT OF MARYLAND  
 3 (Northern Division)  
 4 IN THE MATTER OF \*  
 5 THE COMPLAINT OF  
 6 ETERNITY SHIPPING, LTD. AND \* Civil Action No.:L01CV0250  
 7 EUROCARRIERS, S.A.  
 8 FOR EXONERATION FROM OR \*  
 9 LIMITATION OF LIABILITY  
 10 \*  
 11 \*\*\*\*\* \*  
 12  
 13 Deposition of STOYAN TERZIEV, taken on  
 14 behalf of the Claimant Tate & Lyle North  
 15 American Sugar, Inc., in Athens, Greece,  
 16 commencing at 10:00 a.m., Tuesday, May 27,  
 17 2003, before Danielle Covarrubias, CSR,  
 18 pursuant to Notice.  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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 23 For Defendants HILL RIVKINS & HAYDEN, LLP  
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 25 Shipping COUNSELOR AT LAW  
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1 ATHENS, GREECE, 10:00 AM, TUESDAY, MAY 27, 2003  
 2  
 3 MR. WHITMAN: Preliminarily, for the  
 4 deposition today we are producing on behalf of  
 5 Eternity Shipping and Eurocarriers Mr. Stoyan  
 6 Terziev, former employee of Eurocarriers who has  
 7 consented to appear and testify as a designee,  
 8 and I have reviewed the Notice of Deposition with  
 9 Mr. Terziev and I have circled on the Notice of  
 10 Deposition the areas which he has consented to  
 11 testify to, which are items 3, 4, 5, 6, 7, 14 and  
 12 15.  
 13 Again he is not the only person who  
 14 has been proffered for all of these areas, and I  
 15 am not saying, nor is he saying, that he has all  
 16 of the knowledge that any individual might have  
 17 of these areas, but only that these are the areas  
 18 that he can speak to.  
 19 MR. CLYNE: We are going to mark as  
 20 Terziev 1 a copy of the Notice of Deposition  
 21 pursuant to Rule 30(b)(6) of Eternity Shipping  
 22 and Eurocarriers which Mr. Whitman has circled --  
 23 MR. WHITMAN: Actually Mr. Terziev has  
 24 circled.  
 25 MR. CLYNE: -- the areas or the numbers

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1 Q BY MR. CLYNE: And that key is  
 2 located where?  
 3 A It is with bosun because only bosun  
 4 has the right to operate the crane, so he is the  
 5 only one operating the cranes, when some  
 6 preparing for discharging, but not discharging  
 7 (Short recess)  
 8 Q BY MR. CLYNE: Mr. Terziev, when we  
 9 last left off we were talking about the limit  
 10 switches and your understanding of how this  
 11 accident on July 29, 2000, occurred.  
 12 Let me go back and ask you this.  
 13 The disconnecting of the limit switches in order  
 14 to prepare the crane to be at rest and stowed for  
 15 sea, that's something that you know based on your  
 16 own personal knowledge based on having been on  
 17 board the vessel, is that correct?  
 18 A Yes.  
 19 Q So that has to be done every time,  
 20 is that right?  
 21 A Yes. Again I am saying that not  
 22 only because of my knowledge but because of the  
 23 design of the vessel in order to be fixed in the  
 24 rest position the jib must be at the zero angle,  
 25 but the limit switch is at 30 degrees, and in

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1 order to park the jib in the rest position you  
 2 must disactivate the limit switch.  
 3 Q Where is the switch with the key to  
 4 disconnect the limit switch?  
 5 A This is in the crane driver's,  
 6 operator's cabin.  
 7 Q So somebody would have to go up  
 8 there and disconnect or turn the key?  
 9 A Yes. Actually somebody is there  
 10 operating and when the moment comes to disconnect  
 11 it's just --  
 12 Q Okay. I would like to go back now  
 13 to the time of the beginning of the retrofitting  
 14 of the cranes, and in particular I would like to  
 15 ask you some questions about the Yannis K, okay?  
 16 A Yes.  
 17 Q Can you just describe in general --  
 18 and I really don't want it in detail -- how the  
 19 cranes were removed from the Yannis K.  
 20 A The job was done in Dubai by Nikko  
 21 International Workshop, one of the biggest  
 22 mechanical workshops in Dubai. I think the owner  
 23 is Dutch or British.  
 24 We have removed the cranes in  
 25 parts. First the crew dismantled the wire ropes,

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1 removed the wire ropes from the cranes. This is  
 2 a crew job. Removed, stored in two-meters coil,  
 3 labeled, after when the time comes for the  
 4 retrofitting to know which wire rope is for which  
 5 crane.  
 6 Q Were you there when the wire ropes  
 7 were removed?  
 8 A Yes, I was there from the beginning  
 9 to the end of the removal of the cranes.  
 10 Q Do you know approximately what time  
 11 frame this was?  
 12 A I will tell you the date when was  
 13 the eclipse of the sun; this was the date.  
 14 That's why I remember very well, the full -- The  
 15 full eclipse of the sun, it was the date exactly.  
 16 It was 2000. Maybe we can remember this. It was  
 17 summertime, June or August, summertime in Dubai  
 18 but --  
 19 Q If I were to tell you that the Leon  
 20 I went into the shipyard in November of 1999  
 21 would that assist you? So sometime in the summer  
 22 of 1999?  
 23 A Yes.  
 24 Q Okay. Now you indicated that you  
 25 were there when the wire ropes were removed from

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1 the vessel, is that right?  
 2 A Yes.  
 3 Q And they were stowed in coils, is  
 4 that right?  
 5 A Yes.  
 6 Q Were they checked before they were  
 7 stowed in coils?  
 8 A Yes. This is part of my job. I  
 9 have this job order from the office because it  
 10 was a matter of ordering wire ropes in case we  
 11 have some damage.  
 12 Q So they were inspected by you, is  
 13 that right?  
 14 A Yes.  
 15 Q Can you tell us how that was done?  
 16 A When it's removed first you must  
 17 put it all along the deck. The way of removing  
 18 is press you to do this job. You start turning  
 19 the drum and pull the rope all the way out on the  
 20 deck. This is the best time to inspect because  
 21 when it's in coil you cannot do.  
 22 Q Now all eight wire ropes that were  
 23 on board the Yannis K, were associated with the  
 24 Yannis K, were inspected?  
 25 A Yes.